UNITED STATES DISTRICT COURTUGE Y GIC SDNY
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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TO STATE STATES OF AMERICA

FRANCISCO BRAVO,

Defendant.

05 CRIM 1340

## COUNT ONE

The United States Attorney charges:

1. From in or about August 2003, to in or about October 2003, in the Southern District of New York, FRANCISCO BRAVO, the defendant, unlawfully, willfully, and knowingly, did embezzle, steal, purloin, and convert to his use and the use of another, and without authority, did sell, convey and dispose of a thing of value exceeding \$1,000 of the United States and a department and agency thereof, to wit, BRAVO deposited into his own bank account United States Treasury checks that had been issued and mailed to individuals other than BRAVO, and to which BRAVO was not entitled.

(Title 18, United States Code, Sections 641 and 2.)

## COUNT TWO

The United States Attorney further charges:

1. From in or about August 2003, to in or about October 2003, in the Southern District of New York, FRANCISCO BRAVO, the defendant, unlawfully, willfully, and knowingly, did

execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, credits, assets, and other property owned by and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, BRAVO deposited into a bank account checks, including United States Treasury checks, that had been issued and mailed to individuals other than BRAVO, and to which BRAVO was not entitled.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT THREE

The United States Attorney further charges:

- 3. From in or about August 2003, to in or about October 2003, in the Southern District of New York, FRANCISCO BRAVO, the defendant, and others known and unknown, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with others, known and unknown, to commit offenses against the United States of America, to wit, to violate Title 18, United States Code, Sections 641 and 1344.
- 4. It was a part and an object of the conspiracy that FRANCISCO BRAVO, the defendant, together with his coconspirators, unlawfully, willfully, and knowingly, did embezzle, steal, purloin, and convert to his use and the use of another, and without authority, did sell, convey and dispose of a thing of

value exceeding \$1,000 of the United States and a department and agency thereof, in violation of Title 18, United States Code, Section 641.

5. It was a further part and object of the conspiracy that FRANCISCO BRAVO, the defendant, together with his coconspirators, unlawfully, willfully, and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain money, funds, credits, assets, and other property owned by and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

#### OVERT ACTS

- 6. In furtherance of said conspiracy and to effect the illegal objects thereof, FRANCISCO BRAVO, the defendant, and his co-conspirators committed the following overt acts, among others, in the Southern District of New York:
- a. In or about August 2003, BRAVO and his co-conspirators traveled together to Fleet Bank in the Bronx, New York, where BRAVO opened a bank account under the name "Francisco Bravo, doing business as Bravo Multi Services."
- b. In or about August 2003, BRAVO and his coconspirators traveled together to J.P. Morgan Chase Bank in the

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Bronx, New York, where BRAVO opened a bank account under the name "Francisco Bravo, doing business as Bravo Multi Services."

(Title 18, United States Code, Section 371).

DAVID N. KELLEY

United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

## UNITED STATES OF AMERICA

- v. FRANCISCO BRAVO,
Defendant.

### INFORMATION

05 Cr.

(Title 18, United States Code, Sections 371, 641, 1344, & 2.)

DAVID N. KELLEY United States Attorney.